

# **EXHIBIT H**

**From:** [Hang Le](#)  
**To:** [Shannon Gustafson](#)  
**Cc:** [Diana Esquivel](#); [Amy R. Margolies](#); [Anita K. Clarke](#)  
**Subject:** RE: L.C., et al. (Puga) v. State of California  
**Date:** Wednesday, December 18, 2024 10:13:30 AM

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Good morning Shannon,

At the time of the conference with the Magistrate, there was no issue pending because we had yet to meet and confer on this issue, and as we all saw, Judge Kewalramani does not like to be surprised with issues that the parties have not adequately discussed before bringing the issues before him. Additionally, we sent out the letters yesterday because according to our calculations, yesterday was the deadline to timely to object to the subpoenas. Thus, although we still intended on conferring with you on this issue, in an abundance of caution so as not to blow any deadlines and waive objections, we sent those letters out. Had this issue not been resolved after we met and conferred, we would have brought an ex parte motion to quash.

Additionally, while we still maintain that the records are neither relevant nor proportional to the needs of this case—particularly because the Mr. Puga’s mother has testified that she was aware that he had been incarcerated (and she visited him at times during periods of his incarceration), just not the reasons for the incarcerations because that topic was not something they liked to discuss with each other, and she would be the only plaintiff who defendants could credibly argue that Mr. Puga’s criminal history has any bearing to “society and comfort” since two of the children were very young when Mr. Puga passed away and the older child had very limited contact with him—we do recognize that this issue may be a close call in terms of wrongful death damages.

Accordingly, after speaking with Mr. Galipo about this issue, we are willing to withdraw our objections and send out letters notifying the agencies so, if you are willing to supply us with a copy of the records once you receive them.

Best,  
Hang

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